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MEMO ENDORSED

April 11, 2024

VIA ELECTRONIC FILING

Honorable District Judge Louis L. Stanton

United States District Court

Southern District of New York

500 Pearl Street, Room 21C

New York, New York 10007

USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 4/15/24

Re: Phillipe A. Santiago v Moreta Trucking, LLC and Juan Jesus Moreno Tamez
Civil Docket No.: 21-CV-06761 (LLS)

Dear Judge Stanton,

Please allow this correspondence to serve as a joint status letter in connection to the above-referenced matter. We also write to request a 90-day extension for the parties to submit the Pre-Trial Order from May 24, 2024 to August 22, 2024

Plaintiff has exchanged his expert report with the defendant for Dr. Imran Shira, orthopedic surgeon. The Defendant has exchanged their expert report with the plaintiff for Stephen N. Emolo, an accident reconstruction expert. The Plaintiff's orthopedic medical examination has been scheduled with Dr. Robert Pae for May 3, 2024, and the neurological medical examination has been scheduled with Dr. Alexander Merkle for May 15, 2024.

The parties have agreed to private mediation with NAM. After the defendant's medical examinations of the plaintiff, the parties will schedule a mediation date. The parties are optimistic that a settlement can be reached in the near term. However, in the event the parties' negotiations should stall and we are unable to reach a final settlement, we will submit a Pre-Trial order.

As such, the parties respectfully request that your Honor grant us a 90-day extension from May 24, 2024 until August 22, 2024 to file the Pre-trial Order. We further request that the

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Granted
Louis L. Stanton
4/15/24

Final Pre-Trial Conference currently scheduled for May 31, 2024 be adjourned to August 29, 2024.

This is the Parties' Fourth request for an extension of the Court's Case Management Plan and Scheduling Order.

We thank Your Honor for consideration of this matter.

Respectfully submitted,

Michelle Jean-Jacques

Michelle Jean-Jacques, Esq.

cc: **Via ECF and email: msloane@defensecounsel.com**
Marc Sloane, Esq., Attorney for Defendants